UNITED STATES DISC	TRJ	CT (COU	JRT	
SOUTHERN DISTRICT	OF	NEV	N Y	ORK	

17MISC COSS

DIANA PARKER, EXECUTOR OF THE ESTATE OF GERTRUDE NEUMARK ROTHSCHILD,

Misc. Action No. 17 MISC 0058

Movant,

v.

NOTICE OF MOTION TO COMPEL PRODUCTION OF DOCUMENTS AND TESTIMONY

TODD & LEVI, LLP,

Respondent.	
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PLEASE TAKE NOTICE THAT upon the Order of the Bankruptcy Court of Arizona, the accompanying Memorandum of Law in Support of the Estate of Gertrude Neumark Rothschild's Motion to Compel Production of Documents and Testimony in response to a subpoena served on Respondent Todd & Levi, LLP, and the accompanying Declaration of Alfred E. Donnellan, dated February 16, 2017 (and exhibits thereto), the undersigned will move this Court the Southern District of New York, 500 Pearl Street, Part 1, before Part 1 Judge, New York, NY 10007, on Tuesday, March 21, 2017 at 11:00 a.m. for an order pursuant to Fed. R. Civ. P. 45 to compel compliance with a document and examination subpoena served on Todd & Levi, LLP and such other and further relief as the Court determines warranted.

PLEASE TAKE FURTHER NOTICE that, pursuant to the Local Civil Rule 6.1(b), any opposing memorandum of law and affidavits shall be served within fourteen days after service of the moving papers, any reply memorandum and affidavits shall be served within seven days after service of the opposition papers. The opposition memorandum of law and affidavits shall be served on the undersigned counsel and filed with the court.

DATE: February 22, 2017 Respectfully submitted,

Alfred E. Donnellan, Esq.

Nelida Lara, Esq.

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of the Estate of Gertrude Neumark Rothschild